

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MISSOURI PRIMATE FOUNDATION,
CONNIE BRAUN CASEY, individually,
ANDREW SAWYER, individually, and
JANE DOES 1 and 2,

Plaintiffs,

v.

PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS, INC. and
ANGELA SCOTT a/k/a ANGELA G.
CAGNASSO, individually,

Defendants.

Case No. 4:16-cv-02163

DECLARATION OF JARED GOODMAN

Pursuant to 28 U.S.C. § 1746, I, Jared Goodman, an adult over the age of 21 years, declare the following to be true and correct to the best of my knowledge and belief:

1. I am counsel for Defendants People for the Ethical Treatment of Animals, Inc. (PETA) and Angela Scott ("Scott"). I make this declaration based upon my personal knowledge and upon information available to me as PETA's and Scott's counsel.

2. On November 2, 2016, PETA and Scott sent a Notice of Intent to File Citizen Suit Pursuant to the Endangered Species Act to the Missouri Primate Foundation (MPF), Connie Braun Casey, Andrew Sawyer, the Secretary of the Department of the Interior, and the Director of the U.S. Fish & Wildlife Service.

3. Upon information and belief, on or around December 22, 2016, after receiving PETA and Scott's notice of intent to sue but prior to filing this lawsuit, MPF transferred three chimpanzees to another facility.

EXHIBIT

A

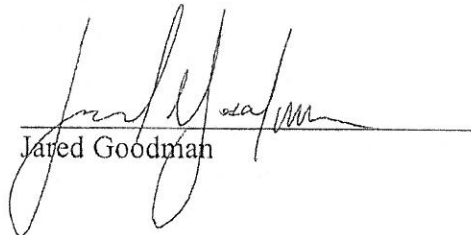
4. Upon information and belief, on or around February 2, 2017, Jane Doe 1, the owner of chimpanzee Allie, transferred ownership of Allie to an accredited sanctuary, and possession of Allie from MPF to the sanctuary.

5. Upon information and belief, at some time after receiving PETA and Scott's notice of intent to sue and before February 2, 2017, Plaintiff Sawyer removed chimpanzee Joey from MPF, where Joey was being boarded indefinitely, and transferred him to an unknown location.

6. Upon information and belief, the removal of each of these five chimpanzees from MPF was prompted by and in response to PETA and Scott's notice of intent to sue the plaintiffs in this action.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on February 28, 2017.


Jared Goodman